David R. King HERRICK, FEINSTEIN LLP One Gateway Center 22nd Floor Newark, New Jersey 07102 (973) 274-2000 dking@herrick.com

Attorneys for Defendants Major Energy Services, LLC and Respond Power, LLC **Document Electronically Filed**

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

RODRIGO CARRERA, individually and on behalf: of all others similarly situated,

Civil Action No.: 3:15-cv-03208 (MAS) (LHG)

Plaintiff,

-against-

STIPULATION AND PROPOSED CONSENT ORDER ADJOURNING MOTION

MAJOR ENERGY SERVICES, LLC, : RESPOND POWER, LLC and JOHN DOES 1-25, :

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties to this action, that Plaintiff's Motion for Class Certification, originally returnable on July 20, 2015, is adjourned on consent until such time as discovery is completed. No other request for an adjournment of Plaintiff's Motion for Class Certification has been made before this Court.

Dated: June 29, 2015

MARCUS LAW, LLC

HERRICK, FEINSTEIN, LLP

By: /s/ Ari Marcus

Ari Marcus, Esq. 1500 Allaire Avenue, Suite 101 Ocean, New Jersey 07712

Attorneys for Plaintiff Rodrigo Carrera

By: /s/ David R. King David R. King One Gateway Center 22nd Floor Newark, New Jersey 07102

> Attorneys for Defendants Major Energy Services, LLC and Respond Power, LLC

THE GLAPION LAW FIRM, LLC

Jeremy M. Glapion 1704 Maxwell Drive, Suite 102 Wall, New Jersey 07719

Co-counsel for Plaintiff Rodrigo Carrera

Plaintiff's Motion for Class Gertification (ECFNo.10) is administratively terminated. The parties so ordered: Shall file correspondence at such time the motion should be reinstated.

Honorable Michael A. Shipp, U.S.D.J.

Dated: June 30 2015